

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY, *et al.*,)
Plaintiffs,)
v.)
BUREAU OF LAND MANAGEMENT, *et al.*,)
Defendants,)
Case No: CV 03-2509-SI
STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR FILING MOTION FOR FEES AND COSTS

Plaintiffs Center for Biological Diversity, et al. and Defendants Bureau of Land Management, et al., by and through their undersigned counsel, say as follows:

WHEREAS:

This Court entered judgment in the above-caption case on September 26, 2006;

Pursuant to Local Rule 54-6, Plaintiffs' Motion for Attorney's Fees and Costs is due within 14 days of the Court's entry of judgment, or on October 10, 2006;

Plaintiffs and Defendants believe that they may be able to resolve the matter of fees and costs through negotiation, and have therefore agreed to the following Stipulation extending Plaintiffs' deadline for filing a Motion for Attorney's Fees and Costs:

THEREFORE:

IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants, through their respective counsel, that, upon approval of the Court, the deadline for Plaintiffs to file any Motion for Attorney's Fees and Costs is extended until December 15, 2006. If by December 15, 2006 the parties have not reached a

1 settlement resolving Plaintiffs' claim for fees and costs, the parties will file a status report with the Court
2 indicating either that the parties require additional time to reach settlement, or setting forth a briefing
3 schedule for resolving Plaintiffs' claim for fees and costs.

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6 Respectfully submitted this 5th day of October, 2006

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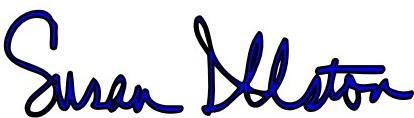
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Attorneys for Federal Defendants

Pursuant to Stipulation, IT IS SO ORDERED.

DATED: _____


HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE